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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND  
DIVISION

JANE ROE, an individual; MARY ROE,  
an individual; SUSAN ROE, an  
individual; JOHN ROE, an individual;  
BARBARA ROE, an individual;  
PHOENIX HOTEL SF, LLC, a  
California limited liability company;  
FUNKY FUN, LLC, a California limited  
liability company; and 2930 EL  
CAMINO, LLC, a California limited  
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-JST

**DECLARATION OF JOHN ROE IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

**ASSIGNED FOR ALL PURPOSES  
TO THE HONORABLE DISTRICT  
JUDGE JON S. TIGAR,  
COURTROOM 6**

Action Filed: 03/14/2024  
Trial Date: Unassigned

1 I, John Roe, declare as follows:

2 1. I am over the age of 18 and am one of the plaintiffs in the above-  
3 captioned action. In order to preserve my anonymity, my appearance in this action is  
4 made using the fictitious name of "JOHN ROE." I have personal knowledge of the  
5 facts stated herein, except for facts that are stated on information, belief, or  
6 understanding. As to the latter, I have a good faith basis for believing them to be  
7 true. If called as a witness, I could and would competently testify thereto. I make this  
8 declaration in support of Plaintiffs' Motion for Preliminary Injunction.

9 2. For approximately four years, I have lived on Dodge Place, in the  
10 Tenderloin neighborhood of San Francisco in the vicinity of Turk Street. My husband  
11 and I rent our home. I am a behavioral health clinician and have a private practice.  
12 My home is within three blocks of 685 Ellis Street, which I understand to be a shelter  
13 run by the City and County of San Francisco, as well as the COVA hotel, which I  
14 understand to be a former shelter run by the City and County of San Francisco. I also  
15 live within six blocks of GLIDE memorial church at 330 Ellis Street.

16 3. The sidewalks in my neighborhood are frequently blocked by groups of  
17 people who appear to be homeless drug users. I see people who appear to be under  
18 the influence of drugs standing, sitting, or lying down unconscious on the sidewalks. I  
19 frequently witness these groups of people smoking, inhaling or injecting what I  
20 believe to be narcotics. I also see lots of discarded items, such as garbage, syringes,  
21 needles, aluminum foil, and what appear to be pipes for smoking drugs. I also  
22 frequently see human feces and bodily fluids such as urine and vomit.

23 4. On my street of Dodge Place, starting in around 2023, a member of  
24 Urban Alchemy began to supervise the entrance of Dodge Place. I believe this was in  
25 response to videos I had been posting on my X (formerly Twitter) account about the  
26 terrible conditions that my street was facing. During the day, the conditions I  
27 describe are lessened. At night, there has been a noticeable increase in hazardous  
28 conditions that affects the use and enjoyment of my property when Urban Alchemy is

1 not supervising Dodge Place. It is my opinion that the conditions during the day have  
2 lessened due to recent increased response, but I am not confident that response will  
3 remain consistent over time. I would like to purchase my home in the Tenderloin, but  
4 will not because I do not have confidence that the conditions will remain under  
5 control during the day in the long term.

6       5.       On many occasions, I have found people who were unconscious, lying in  
7 the entrance area of my home, blocking it. I very frequently see people injecting or  
8 smoking drugs, having sex or masturbating in the open, defecating and urinating in  
9 the open, including in front of my home. I encountered a man who was defecating in  
10 the doorway of my home. When I asked him to leave, he threatened me. While inside  
11 my home, there have been many occasions where I can smell burning cigarettes,  
12 marijuana, and what I think are other drugs being smoked near my home. There  
13 have been occasions when I smelled fires, and then I would see what appear to be  
14 homeless people burning materials on the public street on Dodge Place. I often hear  
15 yelling and fighting outside my home late into the night. I frequently find discarded  
16 tin foil, syringes, pipes, and straws on my street of Dodge Place and outside my  
17 home.

18       6.       When I walk on the sidewalk, I must be careful to avoid stepping in/on  
19 human feces and other bodily fluids, needles, syringes, and drug pipes. When a  
20 sidewalk is blocked by people or debris, I am forced to walk in the street to go around  
21 the blocked sidewalk. I often walk my dogs and will have to be careful that they do  
22 not eat or ingest biohazard materials, like human waste or drug paraphernalia.

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1           7. While these conditions and hazards outside my home will improve at  
2 times, they have been largely consistent and have had a substantial impact on my  
3 ability to enjoy the use of my home. I continue to take extra care for my safety when I  
4 leave my building and walk on the sidewalks in the Tenderloin. I continue to see  
5 feces, garbage, syringes, needles, aluminum foil, and pipes.

6           I declare under penalty of perjury under the laws of the United States of  
7 America that the foregoing is true and correct to the best of my knowledge.

8           Executed on this 22<sup>nd</sup> day of August, 2025, at San Francisco, California.

Signed by:

*John Roe*

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John Roe